

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AMF BOWLING CENTERS, INC., <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:23cv448
)	
THOMAS TANASE)	
)	
Defendant.)	
)	

MOTION TO WITHDRAW

COMES NOW, the Law Offices of Daniel K. Kim, PLLC, by and through undersigned counsel, and respectfully moves this honorable Court for leave to withdraw as counsel for Defendant Thomas Tanase in the above-captioned action and, for the grounds of this motion states as follows:

The Law Offices of Daniel K. Kim, PLLC, through Daniel K. Kim (“Counsel”), were retained by Defendant Tanase on an expedited basis to substitute as counsel for Defendant’s previous counsel, Jay Igiel, who was granted leave to withdraw. Counsel has addressed the immediate needs and requirements of the representation. However, upon further exposure to the facts and issues, the client determined to engage other counsels.

As the Court may be aware, Mr. Tanase has retained two additional separate firms as co-counsel as early as March 15, 2024. Consequently, undersigned Counsel’s services are no longer required, and it is the agreement of both Mr. Tanase and Counsel that Daniel K. Kim and The Law Offices of Daniel K. Kim, PLLC withdraw from this case. As new counsel are up to speed, there is no withdrawal related prejudice to Mr. Tanase. Counsel has provided written

notice to Defendant Tanase in accordance with the Local Rules and Rules of Professional Responsibility.

WHEREFORE it is respectfully requested that this Motion be GRANTED and that the Law Offices of Daniel K. Kim, PLLC and its attorney Daniel K. Kim, Esq. be granted leave to withdraw and that said withdrawal immediately as counsel for the Defendant Thomas Tanase effective upon the date of this Motion.

Respectfully Submitted
Thomas Tanase
By Counsel

Dated: April 1, 2024

/s/ Daniel Kim
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2024 a copy of the foregoing was served on all counsel of record via the CM/ECF system, system.

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